

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Annual Assessment of the Status of)	MB Docket No. 12-203
Competition in the Market for the)	
Delivery of Video Programming)	

**COMMENTS OF
Trumbull Community Television Committee**

The Trumbull Community Television Committee submits these comments in response to the above-captioned Notice of Inquiry ("NOI"), released July 20, 2012, seeking "data, information, and comment on the state of competition in the delivery of video programming."

The Trumbull Community Television Committee was established by town leaders to oversee the operation of our local Education Channel. The channel is carried simultaneously for local viewers by the regional Cable Television supplier, Charter Communications, and statewide by AT&T UVerse. In Connecticut the state Public Utilities Regulatory Authority grants franchises. Local communities are represented by regional Advisory Councils. Charter does not offer Government Channels to its Connecticut subscribers. In Trumbull our Board of Education has determined that there is legitimate educational value in carrying town meetings and announcements along with school based programming on its Education Channel.

The Public Access Channel is operated on a regional basis by Charter Communications and PEG funds collected by Charter and AT&T are given to Charter for its exclusive use by its Public Access Channel. No PEG fees are distributed to support Education Channels. Charter and AT&T have been ordered by the state to work together so that Charter will provide their Public Access Programming for broadcast on UVerse. To date neither company has made any serious effort to accomplish this interconnection and the state has done nothing to enforce its edict.

Furthermore because the Public Access Channel operates on a regional basis none of the communities served have the benefit of a local Public Access Channel. The value of this channel to local communities is questionable.

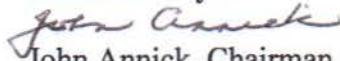
Our Education Channel operates 24 hours a day and is a vital method of local communications for our citizens. We have no radio or commercial TV stations in our community and only a weekly newspaper. In addition to producing many hours of original community and

educational programming each week, the station carries emergency information as needed. We carry town meetings, election returns, school announcements, some football games, and a variety of programs of local interest.

1. How many channels does your MVPD operator(s) provide for PEG programming? *We provide only an Education Channel.*
2. On which tier are these channels placed and is extra equipment required to view them? *On Charter Communications our Education Channel is on the basic tier and it is also available to all UVerse Subscribers. No additional equipment is required to view these channels although we have recently received several complaints from local Charter subscribers that Charter telephone salespeople have told subscribers they must upgrade to a digital box to receive the Education Channel. The digital box is not required and we believe this is a training problem rather than an attempt to deceive. Regardless of the intention some subscribers may be paying for equipment they do not need to view our Education Channel.*
3. Are there more or fewer PEG channels carried on MVPD systems than were carried as of June 2010? *There has been no change in channels offered since June 2011.*
4. What data sources exist to track the availability of PEG programming? *Both Charter Communications and AT&T UVerse refuse to release any subscriber figures. Some subscribers tell us that the availability of our Education Channel influences their service provider choice.*
5. Is there any evidence that AT&T's "Channel 99 PEG product" has hurt PEG viewership? *Since Charter and AT&T have refused to work together to provide a common Public Access Channel, UVerse subscribers do not get that channel in our community. Yet they are charged PEG fees on their billing. As mentioned above the fees collected are given to Charter Communications. Our Education Channel is carried by AT&T UVerse and we have received a few complaints that the UVerse channel 99 is more difficult to use than standard channels and that the video quality is not as good as regular commercial channels. It is logical that this would negatively affect local viewership of PEG Channels. We believe that with the on-demand concept of AT&T UVerse they could solve both problems by reserving three standard channels on which subscribers could select their three preferred PEG channels with higher video quality. This would be in addition to Channel 99 with its unique benefit of neighboring community PEG Channels.*
6. If applicable, explain how cutbacks in financing, state law changes, new technology, and so on have affected PEG programming in your community. *As described above, the state of Connecticut has for many years taken the role of "local" municipality. While this arrangement sometimes means less local input in decision-making, we believe this is a workable arrangement and that the state agency, PURA, sincerely wants to thoughtfully respond to requests from its regional advisory councils. Since we do not receive any of the PEG fees collected, we have developed funding through our Board of Education and our municipality. While the Board of Education has sometimes threatened to reduce funding, we have been successful in keeping the operation of the station a priority for the Board. Our funding has not been cut; but current economic conditions have kept our budget quite tight and this has slowed our ability to expand*

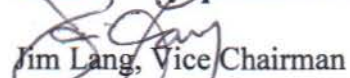
our services. In spite of this we a growing in programming, community awareness, and audience. We suspect that local internet services compete with the Public Access Channel, but that may be due to the lack of local focus of the regional Public Access Channel. However our Education Channel capitalizes on Internet technology and is working to expand our use with our website, live-streaming and citizen retrieval of archived programs.

Submitted by:



John Annick, Chairman
44 Friar Lane
Trumbull, CT 06611
203-258-1024
jaedj@aol.com

Address any questions to:



Jim Lang, Vice Chairman
24 Primrose Drive
Trumbull, CT 06611
203-377-1747
Jim@WizardJim.com